

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

JAY J. SCHINDLER, M.D.,

Plaintiff,

v.

Case No. 05-C-705-C

MARSHFIELD CLINIC,

Defendant.

MARSHFIELD CLINIC'S ADDITIONAL PROPOSED VOIR DIRE QUESTIONS

Defendant, Marshfield Clinic, through its attorneys, Quarles & Brady LLP, hereby proposes that the following voir dire questions be asked in addition to the standard questions attached to the Court's February 15, 2006, Preliminary Pretrial Conference Order.

1. Do you have any education, training or experience in medicine? Please explain.
2. Have you ever worked at a hospital or clinic? If so, what did you do?
3. Do you have any family members or close personal friends who have worked at a hospital or clinic? If so, what do they do?
4. Have you ever sued a doctor, a hospital or a medical clinic because you or a member of your family was unsatisfied or unhappy with the medical care they received? If so, please explain the nature of your claim, and how it was resolved.
5. Have you ever complained to a doctor or a hospital, short of filing a lawsuit, because you or a member of your family was unsatisfied or unhappy with the medical care they received? If so, please explain what was done to resolve your complaint. Were you satisfied with the result?

6. Have you or a member of your family or a close friend ever undergone a surgery or other medical treatment where an unexpected outcome or complication happened? Please explain.

7. (Follow up to Question 6) Do you believe that the unexpected outcome or complication could have been avoided? To your knowledge, was anything done to reduce the chances of a similar outcome or complication happening again?

8. Do you believe that health care organizations have a responsibility to review the care provided by doctors in their organization and take actions to protect patients when problems arise?

9. Do you believe that health care providers should learn from unexpected outcomes and mistakes and do what they can to prevent them from happening again?

10. Have you ever seen a doctor about the possibility of neck or back surgery? Did you have surgery? When? Describe? Were non-surgical treatments tried first? Were you satisfied with outcome?

11. Do you believe that surgeons sometimes are too quick to recommend surgery, rather than trying non-surgical treatments?

12. Have you ever been involved in a legal dispute with your employer? Please explain.

13. Has a member of your family or a close personal friend ever been involved in a legal dispute with their employer? Please explain.

14. Have you ever had a job where one of your responsibilities was to supervise other people? If so, have you ever had to recommend firing or disciplining anyone? Please explain.

15. Do you have any education, training, or experience in the law? Please explain.

16. Have you ever worked in a law office or in the legal profession? Please explain.
17. Do you have any family members or close personal friends who have worked in the legal profession? Please explain.
18. Do you know any of the following people:

Dr. Paul Liss
Dr. Robert Gribble
Dr. Donald Kelman
Dr. John Neal
Dr. Rodney Sorenson
Barbara Kuhl
Deb Weiland
Greg Geissinger
Robert McMahon
Dr. Charles Mick
Dr. Raj Rao
Dr. Greg Przybylski
Dr. Michael Salcman
Barbara Blackmond
Dr. John Shershow
Dr. Richard Meadows

Dated this 26th day of April, 2007.

DONALD K. SCHOTT
State Bar No. 1010075
SARAH E. COYNE
State Bar No. 1025021
MATTHEW J. DUCHEMIN
State Bar No. 1027594

s/ Matthew J. Duchemin
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